

**Lower Willamette Group**

Co-Chairperson: Bob Wyatt, NW Natural  
Co-Chairperson: Jim McKenna, Port of Portland  
Treasurer: Larry Patterson, ATOFINA

RECEIVED

OCT 21 2003

Environmental Cleanup Office

October 15, 2003

Chip Humphrey  
US Environmental Protection Agency, Region 10  
811 SW 6th Avenue, 3rd Floor  
Portland, OR 97204

Tara Martich  
US Environmental Protection Agency, Region 10  
1200 Sixth Avenue, M/S ECL-115  
Seattle, WA 98101

RE: Portland Harbor Project

Dear Chip and Tara:

The Lower Willamette Group is proceeding with the 3b revisions to the Programmatic Work Plan (PWP) based on the results of our recent technical subgroup conference calls. As you are aware, there was some delay in arranging the technical conference calls in order to accommodate the schedules of EPA and its partners (the final Nature and Extent call was held last Friday afternoon, October 10th). In addition, follow-up calls are necessary to finalize some human health issues (October 20th), and to discuss the protocol for sampling outside of the ISA relating to site boundary definition (to be scheduled later this week). This leaves little time to complete the necessary revisions to the PWP before the October 27th deadline. Our concern over the schedule is compounded by the fact that many of the PWP 3b issues are interrelated to the Round 2a Field Sampling Plan (FSP), on which we have yet to receive EPA's comments.

The LWG sent a letter to you on September 26, 2003, detailing our concerns about the schedule. At the time we sent that letter, we were anticipating the quick delivery of your FSP comments. The letter also indicated that in order to produce a complete revised PWP by October 27th we would need the following by October 14<sup>th</sup>: a) feedback on the Category 1, 2, 3a, and 4 issues; b) completion of the technical discussions on 3b issues and receive your decision on those issues; and c) receive your decision on 3b comments that were not set for further technical discussion. The LWG believes significant progress has been made on 3b comments, and is committed to continued cooperation with EPA and its partners on the remaining issues, but the LWG still needs your feedback and decision on all of the issues, as well as your FSP comments. In order to do so, we respectfully request the following modification to the date for submission of the revised PWP: Submission on the later of November 17, 2003, or three weeks from our receipt of EPA's FSP comments.

The revised schedule would provide the LWG a minimal amount of time to assess the FSP comments and their potential impact on the overall project schedule and budget, and make the necessary changes to the PWP. Your immediate attention to this matter would be greatly appreciated. I will contact you tomorrow, October 16, to confirm your response to this request.



Chip Humphrey and Tara Martich  
October 15, 2003  
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Sincerely,



Jim McKenna  
Co-Chair

cc: LWG Executive Committee  
LWG Legal Committee